

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JOSEPH ABOUD MANUFACTURING  
CORP.**, on behalf of itself and all others similarly  
situated,

Plaintiff,

vs.

**WILLIAM PRYM GMBH & CO., KG; PRYM  
CONSUMER USA, INC.; PRYM FASHION,  
INC.; COATS PLC; COATS NORTH  
AMERICA DE REPUBLICA DOMINICANA,  
INC.; YKK CORPORATION; YKK  
CORPORATION OF AMERICA, INC.; YKK  
(U.S.A.) INC.; YKK SNAP FASTENERS  
AMERICA, INC.; and SCOVILL  
FASTENERS, INC.**

Defendants.

Civil Action No. 07-cv-10641(DC)

**MOTION TO ADMIT  
COUNSEL  
PRO HAC VICE**

FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
JAN 4 2008  
PM 1:37

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States Courts for the  
Southern and Eastern Districts of New York, I Linda P. Nussbaum, a member in good standing  
of the Bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Candice J. Enders  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Phone: (215) 875-3000  
Fax: (215) 875-4604

Candice J. Enders is a member in good standing of the Bar of the Commonwealth of  
Pennsylvania.

There are no pending disciplinary proceedings against Candice J. Enders in any State or  
Federal court.

637318 #15 1-4-08 1462

Dated: January 3, 2008  
New York, New York

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Linda P. Nussbaum", is written over a horizontal line.

Linda P. Nussbaum (LN-9336)  
KAPLAN, FOX & KILSHEIMER, LLP  
850 Third Avenue, 14<sup>th</sup> Floor  
New York, NY 10022  
Phone: (212) 687-1980  
Fax: (212) 687-7714

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JOSEPH ABBOD MANUFACTURING  
CORP.**, on behalf of itself and all others similarly  
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Defendants.

Civil Action No. 07-cv-10641(DC)

**AFFIDAVIT OF LINDA P.  
NUSSBAUM IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

State of New York     )  
                                  )     ss  
County of New York    )

Linda P. Nussbaum, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Kaplan, Fox & Kilsheimer, LLP, Counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Candice J. Enders as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to Practice law on March 15, 1978. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Candice J. Enders since 2004.
4. Ms. Enders is an attorney at the Firm of Berger & Montague, P.C. in Philadelphia, PA.
5. I have found Ms. Enders to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Ms. Enders, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Candice J. Enders, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Candice J. Enders, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

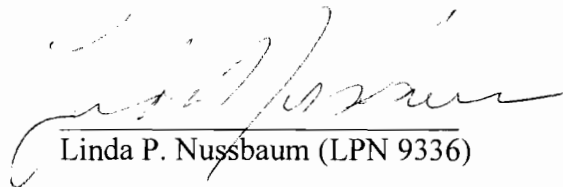
Dated: January 3, 2008  
New York, NY

Respectfully submitted,



1/4/08

**TIREK J. GAYLE**  
Notary Public, State of New York  
No. 01GA6066847  
Qualified in Bronx County  
Commission Expires Nov. 26, 2009



Linda P. Nussbaum (LPN 9336)



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***Candice Joy Enders, Esq.***

**DATE OF ADMISSION**

***December 12, 2003***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**

**Dated: December 24, 2007**

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

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SOUTHERN DISTRICT OF NEW YORK

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AMERICA, INC.; and SCOVILL  
FASTENERS, INC.**

Defendants.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Linda P. Nussbaum for Joseph Abboud Manufacturing Corp. and said  
sponsor attorney's affidavit in support,

**IT IS HEREBY ORDERED THAT:**

Candice J. Enders  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Phone: (215) 875-4675  
Fax: (215) 875-4604

Is admitted to practice pro hac vice as counsel for Joseph Abboud Manufacturing Corp. in the  
above captioned case in the United States District Court for the Southern District of New York.  
All attorneys appearing before this Court are subject to the Local Rules of this Court, including  
the Rules governing discipline of attorneys. If this action is assigned to Electronic Case Filing  
(ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).  
Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

\_\_\_\_\_  
Judge Denny Chin

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sponsor attorney's affidavit in support,

**IT IS HEREBY ORDERED THAT:**

Candice J. Enders  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
Phone: (215) 875-4675  
Fax: (215) 875-4604

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Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

\_\_\_\_\_  
Judge Denny Chin

**AFFIDAVIT OF SERVICE**

The undersigned hereby certifies that on the 3<sup>rd</sup> day of January, 2008, true and correct copies of the annexed Motion to Admit Counsel Pro Hac Vice along with all supporting documents was served via First Class U.S. Mail on the following:

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Roseann Kelly